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Norman H. Bangert
Governor

Suzanne Dandoy, M.D., M.P.H.
Executive Director

OCT 29 1986
538-6108

FOR YOUR
INFO.
IS
10-29-86

Craig Lucy
Environmental Engineer
Intermountain Power Project
Route 1, Box 824
Delta, Utah 84624

Re: Unit #1 Compliance
Demonstration, Preliminary
Report Review and IPP's
October 14, 1986 Reply to
September 29, 1986 Notice of
Violation - Millard County

Dear Mr. Lucy:

In follow-up to our preliminary report review meeting held October 15, 1986, please respond to the following questions, comments and concerns regarding the review of the preliminary report for Unit #1 compliance testing.

1. All references that IPP is subject to Subpart D requirements should also include and reference the State of Utah modified approval order dated December 19, 1985.
2. Page 7 states that the SO₂ limitation for Unit #1 is 0.15 lbs/MBTU. The state approval order specified 0.150 lbs/MBTU. A third decimal place is needed.
3. The report states that test contractors modified the sample point procedures outlined in CFR 40, Method 1. The May 2, 1986 pretest information letter specifically states in Item No. 8: Any deviations from CFR 40 Part 60, Appendix A methods must be approved by the administrator (Executive Secretary, Utah Air Conservation Committee) prior to testing. The administrator was not consulted regarding the modification. Explain the deviation.
4. Page 15 - measurements of length in units are inconsistent. Either feet should be used or meters.
5. Page 16 states that the SO₂ test impingers were purged with clean dry air for 15 minutes following each test. Meter volumes do not support this claim (CFR 40, Method 6, 4.1.3). Explain the values.

Kenneth L. Aarnes, Director • Division of Environmental Health

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6. The report notes that one of the two QC SO₂ samples was dropped and broken. This should have been reported to either EPA QAD source branch or to the Utah Bureau of Air Quality in order that a replacement QC sample could have been obtained and analyzed. Explain the deviation.
7. Please submit calculations for NO_x QC sample 804113. Calculations should conform to those in CFR 40, Method 7.
8. No operating parameters for Unit #1 were submitted for the particulate test. Refer to the pretest letter dated May 2, 1986 for the required information.
9. The report does not supply the requested data for the soot-blowing run (#2). The emission rate for particulate, as stated in the report, is incorrect until the soot-blowing equation is performed.
10. The report does not provide any pretest and posttest impinger weights for the particulate test. These are required.
11. Particulate test raw data sheets show that volumes of air greater than that required to perform leak checks have passed through the dry gas meter following each port traverse. Explain why the meter ending and beginning show this. If in fact it is due to leak checks, where are the leak check data?
12. The report does not contain opacity CEM data that is concurrent with the particulate test runs as required by CFR Vol. 50, No. 249 December 12, 1985, Standards of Performance for New Stationary Sources; Opacity Provision. Provide the appropriate data.
13. The report does not contain an ultimate coal analysis. This is required.
14. Raw data sheets for the SO₂ tests show that meter readings were taken every seven minutes. CFR 40, Method 6, 4.1.3 requires that meter readings be taken at least every five minutes. Explain the deviation.
15. Method 6 SO₂ field data sheets show that the sample rate exceeded approximately 1.0 liter/min (+ 10 percent) during all SO₂ tests. Sample rates are twice the rate specified in CFR 40, Method 6, 4.1.3. Explain the deviation.

16. The report shows no data to support that the SO₂ collection efficiency was 99% for each run. DFR 40, Method 6, 2.1.2 requires that this be documented in the report. Provide the data.
17. The entire report section dealing with the NO_x tests is unreadable (raw data). Provide readable sheets.
18. Page G 126 shows a K_c factor that is incorrect. Explain the deviation...
19. No scrubber data are supplied in the report. Readings were to be made every 15 minutes. Provide the data.
20. No coal balance certification documentation is provided. Provide the data.
21. No filter balance scale information is contained in the report as required. Provide the data.
22. The report contains no ledger of the chain of custody for the test samples. Provide chain of custody information.
23. In the "Stack Gas Emission Monitor Certification Test Program" report SO₂ analysis, Page G 137 and G 139, Clean Air Engineering used a Vsoln of 500 ml. This is a deviation of Method 6 which states that the total volume of solution in which the sulfur dioxide sample (Vsoln) is contained will be 100 ml. Explain the deviation.
24. After the review of the stack gas report, it was determined that the calibration drift tests conducted on the Teco NO_x analyzer and Western Research SO₂ analyzer had not met the requirement of performance specification two. You were notified of this problem and asked to make calibration corrections to these instruments and then provide the computer printouts of calibration zero and span data over a 168-hour period. The requested information from this recalibration showed that the Teco NO_x analyzers (inlet and outlet) had complied to performance specification two for calibration drift test. However, the Western Research SO₂ analyzers (inlet and outlet) did not show compliance to performance specification two for calibration drift test. What action will be taken to show compliance to calibration drift test with the Western Research analyzer (inlet and outlet)?

25. No computer printout of NO_x data was recorded by the Teco NO_x analyzer at the inlet during the relative accuracy test. (See Appendix B of the "Stack Gas Emission Monitor Certification Test Program"). A review of the relative accuracy test page A19 of the report for the inlet NO_x analyzer shows NO_x inlet data. It appears that inlet NO_x data were obtained from outlet NO_x analyzer data recorded on June 4, 1986; see page B23 through B31.

- a. Why aren't the Teco NO_x analyzer data being recorded by the KVB computer at the inlet?
- b. Where did the inlet NO_x data come from which was used in the Teco NO_x inlet analyzer relative accuracy test?
- c. Justify why another relative accuracy test should not be required if IPSC wants to save the June 6th inlet test.
- d. When will another relative accuracy test be scheduled if IPSC wants to discard the June 6th NO_x inlet test?

The following remarks and requests relate to the September 29, 1986 notice of violation:

1. In response to your letter dated October 14, 1986, Jim Stephens of this office communicated by telephone with Dennis Killman on October 22, 1986. During that call it was determined that the reserve coal pile would reach the storage capacity and be sealed to avoid excessive blowing emissions within one year from the date of the October 14, 1986 letter, and as an interim measure to control blowing dust, water sprinkling and compaction were being used. Also, the active coal pile dust problem would be investigated by Black and Veatch Consulting Engineers. Their recommendations could be received by IPP by December 30, 1986 and an IPP corrective action proposal and time schedule could then be provided the Executive Secretary by January 15, 1987.
2. Jim Stevens was also told the limestone unloading and telescopic discharge excessive opacity problem would be investigated by Black and Veatch Consulting Engineers and their recommendations also could be received by IPP by December 30, 1986. An IPP corrective action proposal and time schedule could then be provided the Executive Secretary by January 15, 1987.